

STATE OF OHIO)
COUNTY OF CUYAHOGA)

AFFIDAVIT OF JAMES A. CLIMER

Now comes James A. Climer, who being first duly sworn according to law, deposes and states the following:

1. Affiant is counsel of record for Defendants City of University Heights and Michael Dylan Brennan and will also represent New Party Defendants Luke McConville, Paul Siemborski, April Urban, Michael Fine, Stephanie Scalise, and Geoff Englebrecht in Case Number 1:22-cv-01594, in the United States District Court, Northern District of Ohio.

2. Affiant states the First Amended Complaint in this case makes wide-ranging and detailed allegations of fact, many of which are new to the case, that require a detailed review and consultation with the Mayor Brennan and the New Party Defendants.

3. Affiant further states that the Motion for Enlargement of Time to which this Affidavit is appended is interposed not for purposes of harassment or delay, but in furtherance of the interests of justice to permit full consultation with said Defendants in order to frame a proper response to the First Amended Complaint filed in this action and to establish a single answer date to permit the filing of a one answer on behalf of the present Defendants and the New Party Defendants.

4. The foregoing is based upon Affiant's personal knowledge unless otherwise designated.

FURTHER AFFIANT SAYETH NAUGHT.

JAMES A. CLIMER

SWORN TO BEFORE ME, and subscribed in my presence on May 22nd, 2023.

Synthia Wahlstrom
NOTARY PUBLIC



SYNTHIA WAHLSTROM
Notary Public, State of Ohio
My Commission Expires
January 16, 2026